

**Consumer Financial Protection Bureau
Solicitation Number CFP-17-R-00001
Attachment 3 – Sample Task Orders**

Please use the instructions below for each of the included Sample Task Orders. Each Sample Task Order includes a description of the requirement¹ below, but the Contractor must also meet all applicable requirements set forth in the Performance Work Statement (PWS) in addition to all Task Order-specific requirements.

Instructions:

Based upon the following information, the Offerors must provide a detailed response explaining its plan for distributing redress to victims for each of the three (3) Sample Task Orders. It is expected that the Offeror include justification for its proposed approach and a description (if applicable) of other alternatives explored.

Include the following elements in response to each Sample Task Order:

1. Money management- CFPB requirements and further details are found in Section 3.2 of the PWS.
2. Victim identification and data analysis- CFPB requirements and further details are found in Section 3.3 of the PWS.
3. Claims processing- CFPB requirements and further details are found in Section 3.4 of the PWS.
4. Communication and help services- CFPB requirements and further details are found in Section 3.5 of the PWS.
5. Funds distribution & mailing- CFPB requirements and further details are found in Section 3.6 of the PWS.
6. Reporting- CFPB requirements and further details are found in Section 3.7 of the PWS.
7. Final accounting- CFPB requirements and further details are found in Section 3.8 of the PWS.
8. Include any assumptions made regarding the information provided based on your experiences (e.g., assumptions made about the aging of victim data).

Sample Task Section page limit: 10 pages total (all 3 sample tasks).

In addition to the responses to the Sample Task Orders, the Offeror may also submit a statement of technical capabilities to identify any available services the offeror has capability to provide under the requirements found in Section 3.0 of the PWS, but not necessarily recommended in their sample task responses. The statement of technical capabilities is optional but if included should not exceed two (2) pages total.

¹ Please note that all Sample Task Order(s) provided herein are for informational purposes only and the names of entities outlined in each case are not representative of any actual entities of which the Bureau has a pending Enforcement action against.

SAMPLE TASK ORDER 1

Case Description: Hilton Head

Overview:

Hilton Head Servicing, LLC (Hilton Head) is a Mortgage Servicer responsible for managing mortgage loans on behalf of the owners or guarantors of borrowers' loans. On December 23, 2014, the Bureau entered into a consent agreement (Final Order) in federal district court. The Final Order required Hilton Head to pay \$30,000,000 to the Bureau for victim compensation for consumers whose loan modifications were delayed, consumers who had their short sale decisions delayed and consumers who were charged convenience fees when paying their mortgage. This amount less administrative expenses will be distributed as Bureau Administered Redress to victims in this case.

Funds Distribution:

There are three classes of victims in this matter, Class A, Class B, and Class C.

- Class A consists of consumers whose trial loan modifications were delayed in converting to permanent loan modification.
- Class B consists of consumers whose short sale decisions were delayed.
- Class C consists of consumers whose consumers who were charged convenience fees in order to make a payment on their mortgage loan.

There are no instances of overlap of consumers in Class A with Class B. There are no instances of overlap between Class B and Class C. There are instances where consumers in Class A overlap with those in Class C.

The Consent Order awarded \$21 million to Class A. The remainder, \$9 million, was awarded to Class B (\$8 million) and Class C (\$1 million). Eligible consumers will receive a pro rata share of their total harm after accounting for the administrative expenses.

Eligible Victims:

Eligible victims include consumers whose residential mortgage loan was serviced by Hilton Head between March 1, 2009 and August 31, 2013.

- Total Number of Victims: approx.248,000
 - Class A: 15,592
 - Class B: 148,754
 - Class C: 83,654
- Total Victim Harm: \$30,000,000 (Class A: \$21,000,000 ; Class B: \$8,000,000; and Class C: \$1,000,000)
- Total Distribution Amount: \$30,000,000 (minus administrative costs)

Calculation of Victim Compensation:

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To calculate the victims' compensable harm for the Hilton Head matter, the Contractor will proportionately reduce each consumer's harm amount outlined in the data by the amount necessary to cover the administrative expenses of the funds distribution. Some victims may be included in multiple loans and/or classes; their harm should be rolled up into a single payment.

The funds allocated to any victims whose total harm falls below the de minimis threshold should be redistributed among the remaining victims up to 100% of each victim's harm. Any remaining funds from the initial distribution amounts of \$30,000,000 (less any administrative expenses) may be applied pro-rata to all victims in the class in a subsequent distribution.

Location Identification:

At a minimum, address standardization and National Change of Address (NCOA) updates will be required for all consumers.

Primary Source Data:

- Data Format: 3 Excel Files
- Lines of data: 248,000

CFPB will provide a detailed schedule of harm amount per victim to the Contractor in 3 Excel spreadsheets.

The first spreadsheet, Class A (trial loan modifications were delayed in converting to permanent loan modification) outlines the following (15,592 records) on a per consumer basis:

- Account Number
- Category (Status of mortgage loan)
- Status (Overall status of the consumer's account)
- Victim Name
- Co-Applicant Name
- Address Line 1
- Address Line 2
- City
- State
- Zip
- Phone number (Home or cell)
- Consumer harm amount
- *SSNs will be provided as required if taxable.

The second Spreadsheet, Class B (short sale decisions were delayed), outlines the following (148,754 records) on a per consumer basis:

- Account Number
- Category (Status of mortgage loan)
- Status (Overall status of the consumer's account)
- Victim Name
- Co-Applicant Name
- Address Line 1

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- Address Line 2
- City
- State
- Zip
- Phone Number (Home or cell)
- Consumer harm amount
- *SSNs will be provided as required if taxable.

The third Spreadsheet, Class C (consumers who were charged a convenience fee when paying their mortgage.), outlines the following (83,654) on a per consumer basis:

- Account Number
- Category (Status of mortgage loan)
- Status (Overall status of the consumer's account)
- Victim Name
- Co-Applicant Name
- Address Line 1
- Address Line 2
- City
- State
- Zip
- Phone number (Home or cell)
- Consumer harm amount:
 - This data field includes a summation of the harm amount related to the delay in trial loan modifications converting to permanent loan modification and the harm amount related to the convenience fee. The final consumer harm amount for Class C should include only the convenience fee, not any harm related to the delay in the trial loan modification. All consumers who had a delay in trial loan modification are also included Class A.
- *SSNs will be provided as required if taxable.

SAMPLE TASK ORDER 2

Case Description: Bank of Potomac

Overview:

On February 5, 2015, the Bureau entered into a consent agreement with Bank of Potomac. The Bureau alleged that Bank of Potomac violated: (1) Section 8(a) of the Real Estate Settlement Procedures Act, 12 U.S.C. § 2607(a) (“RESPA”); (2) Section 1036(a)(1)(A) of the Consumer Financial Protection Act of 2010 (“CFPA”), 12 U.S.C. § 5536(a)(1)(A); and (3) the Maryland Consumer Protection Act, Md. Code Ann., Com. Law §§ 13-101 through 13-501 (2013 Repl. Vol.) (“CPA”). The consent order required Bank of Potomac to pay the Bureau \$366,500 in redress. This amount less administrative expenses will be distributed as Bureau-Administered Redress to victims in this case.

Funds Distribution:

The victims will receive a pro rata share of the amount available for distribution, equal to the redress funds minus administrative costs.

Eligible Victims:

Eligible victims are those consumers who, from January 1, 2010, until December 15, 2013, closed loans with the loan officers employed by Bank of Potomac that received marketing services paid for by MD-DC Title Company, LLC, for which MD-DC Title Company provided settlement services. There is one class of victims for this case.

- Total Number of Victims: approx. 191
- Total Distribution Amount: \$366,500 (less administrative expenses)
- Total Harm Amount: approx. \$371,000

Calculation of Victim Compensation:

The CFPB will provide the dataset containing victim information. As applicable, the Contractor will be required to de-duplicate the data and to roll-up multiple instances of harm to arrive at a single victim payment.

To calculate the victims’ payments for the Bank of Potomac matter, the Contractor will use the given harm amounts provided by the CFPB, and apply a pro-rata formula based on the total distribution amount less administrative costs.

The funds allocated to any victims whose total harm falls below the de minimis threshold (\$10 in this matter) should be redistributed among the remaining victims up to 100% of each victim’s harm.

Location Identification:

At a minimum, address standardization and NCOA updates will be required for all consumers.

Primary Source Data:

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- Data Format: Excel File
- Lines of data: 191

CFPB will provide an Excel sheet of affected Bank of Potomac consumers, which will include name, address, loan number, settlement date, and harm amount. The data will be provided in a single spreadsheet. The Excel spreadsheet will contain data outlining the following:

- Victim Name
- Loan Number
- Settlement Date
- Harm Amount
- Address Line 1
- Address Line 2
- City
- State
- Zip

SAMPLE TASK ORDER 3

Case Description: ABLS Law Group

Overview:

In a stipulated final judgment and order filed in a Federal district court on February 1, 2013, the court found that ABLs Law Group had violated the Consumer Financial Protection Act's prohibition against unfair, deceptive, and abusive acts and practices and Regulation O in connection with its unlawful mortgage relief schemes. The order required ABLs Law Group to pay \$100,000 in civil penalties, forfeit any rights to funds in a receivership estate, and pay \$15,000,000 in monetary relief and damages, which was suspended upon satisfaction of the specified terms of the order. Of the \$15,000,000 ordered, \$200,000 was collected as Bureau-Administered Redress (BAR), and the remaining \$14,800,000 was allocated to the class of victims from the Bureau's Civil Penalty Fund (CPF).

Funds Distribution:

Victims will receive up to 100% reimbursement of the fees they paid to the Defendant for mortgage relief services between January 1, 2010 and February 1, 2013.

There is one class of victims in this matter. However, the two sources of funding (BAR and CPF) must be accounted for and maintained separately. To the maximum extent practicable, each consumer should only receive one (1) check that is funded from one (1) of the accounts.

Administrative expenses will be covered separately, and not be paid out of the \$15,000,000 allocated for victim compensation.

Eligible Victims:

The class of victims to receive payments from BAR and the CPF includes all consumers who paid the Defendant for mortgage relief services between January 1, 2010 and February 1, 2013.

- Estimated Number of Victims: 5,000-5,400
- Total Distribution Amount: up to \$15,000,000
- Total Consumer Harm: TBD (described below)

Calculation of Victim Compensation:

The CFPB will provide all available data containing victim information (see Appendix I). All data will be collected and tracked by the Contractor. From this data, the Contractor will be required to create a victim list, along with lists of victims with partial address and/or harm information.

Based on preliminary reviews of the data, the CFPB anticipates that there is approximately \$9,000,000 in known consumer harm. Data entry and compilation and subsequent refinement will be necessary in order to identify victims and determine to harm amounts. A claims process will be required to compensate consumers without known harm amounts.

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Each victim should receive up to 100% reimbursement of the fees they paid to the Defendant. Some victims may have made multiple payments to the defendant, but their harm should be rolled up into a single reimbursement payment.

If the total amount of unlawful fees exceeds \$15,000,000, the Contractor may be required to calculate each victim's pro rata share of the total funds available for distribution.

Location Identification:

Address standardization and NCOA updates will be required on all addresses obtained from the data. As appropriate, the vendor will be required to provide additional analysis/support in identifying and locating victims.

Available Data:

The Bureau has collected data from several sources including the Defendant, a court-appointed receiver, and five (5) separate banks. The Contractor will be required to review the available data and prepare a consumer victim harm list which will include at minimum victim name, address, and harm amount. In addition, the Contractor will be required to roll up multiple instances of harm to arrive at a single victim payment, and de-duplicate the data.

A list of all available victim data has been listed below in *Appendix I*, "ABLS Law Group Victim Data Catalogue." Additionally, the Bureau has identified key data points within each data source and listed those in *Appendix II*, "Data Source Matrix."

Appendix I

Data Catalogue

01. **BankStatements(1).pdf** – XYZ Bank Account xxxx1234 Statements, January 2010 – April 2010 (518 pages, ~283 consumer deposit images)
 - a. **Source:** XYZ Bank
02. **BankStatements(2).pdf** – XYZ Bank Account xxxx1234 Statements, April 2010 – June 2010 (536 pages, ~282 consumer deposit images)
 - a. **Source:** XYZ Bank
03. **BankStatements(3).pdf** – XYZ Bank Account xxxx1234 Statements, July 2010 – August 2010 (565 pages, ~297 consumer deposit images)
 - a. **Source:** XYZ Bank
04. **BankStatements(4).pdf** – XYZ Bank Account xxxx1234 Statements, September 2010 – October 2010 (535 pages, ~304 consumer deposit images)
 - a. **Source:** XYZ Bank
05. **BankStatements(5).pdf** – XYZ Bank Account xxxx1234 Statements, October 2010 – December 2010 (578 pages, ~364 consumer deposit images)
 - a. **Source:** XYZ Bank
06. **BankStatements(6).pdf** – XYZ Bank Account xxxx1234 Statements, December 2010 – January 2011 (540 pages, ~377 consumer deposit images)
 - a. **Source:** XYZ Bank
07. **BankStatements(7).pdf** – XYZ Bank Account xxxx1234 Statements, January 2011 – February 2011 (553 pages, ~398 consumer deposit images)
 - a. **Source:** XYZ Bank
08. **BankStatements(8).pdf** – XYZ Bank Account xxxx1234 Statements, February 2011 – March 2011 (564 pages, ~396 consumer deposit images)
 - a. **Source:** XYZ Bank
09. **BankStatements(9).pdf** – XYZ Bank Account xxxx1234 Statements, April 2011 – May 2011 (573 pages, ~385 consumer deposit images)
 - a. **Source:** XYZ Bank
10. **BankStatements(10).pdf** – XYZ Bank Account xxxx1234 Statements, May 2011 – June 2011 (558 pages, ~448 consumer deposit images)
 - a. **Source:** XYZ Bank
11. **BankStatements(11).pdf** – XYZ Bank Account xxxx1234 Statements, June 2011 – July 2011 (566 pages, ~386 consumer deposit images)

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- a. **Source:** XYZ Bank
- 12. **BankStatements(12).pdf** – XYZ Bank Account xxxx1234 Statements, July 2011 – August 2011 (507 pages, ~387 consumer deposit images)
 - a. **Source:** XYZ Bank
- 13. **BankStatements(13).pdf** – XYZ Bank Account xxxx1234 Statements, August 2011 – September 2011 (502 pages, ~401 consumer deposit images)
 - a. **Source:** XYZ Bank
- 14. **BankStatements(14).pdf** – XYZ Bank Account xxxx1234 Statements, September 2011 – October 2011 (501 pages, ~378 consumer deposit images)
 - a. **Source:** XYZ Bank
- 15. **BankStatements(15).pdf** – XYZ Bank Account xxxx1234 Statements, October 2011 – November 2011 (543 pages, ~421 consumer deposit images)
 - a. **Source:** XYZ Bank
- 16. **BankStatements(16).pdf** XYZ Bank Account xxxx1234 Statements, November 2011 – December 2011 (514 pages, ~371 consumer deposit images)
 - a. **Source:** XYZ Bank
- 17. **BankStatements(17).pdf** – XYZ Bank Account xxxx1234 Statements, December 2011 – January 2012 (535 pages, ~387 consumer deposit images)
 - a. **Source:** XYZ Bank
- 18. **BankStatements(18).pdf** – XYZ Bank Account xxxx1234 Statements, January 2012 – February 2012 (527 pages, ~375 consumer deposit images)
 - a. **Source:** XYZ Bank
- 19. **BankStatements(19).pdf** – XYZ Bank Account xxxx1234 Statements, February 2012 – March 2012 (548 pages, ~411 consumer deposit images)
 - a. **Source:** XYZ Bank
- 20. **BankStatements(20).pdf** – XYZ Bank Account xxxx1234 Statements, March 2012 – April 2012 (511 pages, ~406 consumer deposit images)
 - a. **Source:** XYZ Bank
- 21. **BankStatements(21).pdf** – XYZ Bank Account xxxx1234 Statements, April 2012 – May 2012 (277 pages, ~227 consumer deposit images)
 - a. **Source:** XYZ Bank
- 22. **AccountDetails.pdf** – Community Bank Account xxxx5432 Statement, May 2012 – July 2012 (2 consumer deposit images); Smith Account xxxx8642 Statements, May 2012 – December 2012 (0 consumer deposit images); 64 pages
 - a. **Source:** Community Bank

23. **Consumer Detail.xlsx** – Excel Spreadsheet created by CFPB’s Enforcement team compiling consumer deposit information from 12 Defendant bank accounts, representing 8,728 consumer deposits and \$9,244,380.; 9382 transactions
 - a. Spreadsheet contains consumer name (where legible), check amount, check number, check date, account in which check deposited, and source of data, among other fields.
 - b. **Source:** Compiled by CFPB Enforcement Team
24. **email- List of Clients.pdf** – Email from Receiver to CFPB Enforcement team, attaching an inventory of clients (#25 below) and excerpts from the Temporary Receiver’s Initial Report (#26 below); 4 pages
 - a. **Source:** Defendant records provided by Court Appointed Receiver
25. **Inventory of Open Files Prepared by Processing Staff about July 15 2013.pdf** – Document detailing the inventory of open files by employee, prepared by the former processing manager and his employee about July 15, 2013; 113 pages.
 - a. This document contains consumer contact information (consumer names, addresses, and phone numbers)
 - b. **Source:** Defendant records provided by Court Appointed Receiver
26. **CFTC file data 01.11.13.docx** – Document with excerpts from the Temporary Receiver’s Initial Report describing how #25 was prepared and analyzed, and the conclusion that there were 828 active files; 1 page.
 - a. **Source:** Created by Court Appointed Receiver
27. **email - Loan Mod Data extraction into Excel.pdf** – Email from Receiver to CFPB Enforcement team, attaching and explaining 4 spreadsheets (#28-31 below) obtained from the Defendants’ records; 2 pages.
 - a. The attached spreadsheets are not the most reliable source of payment information and should mainly be used for victim contact information and as a cross-reference for payment amounts in other data sources.
 - b. **Source:** Defendant records provided by Court Appointed Receiver
28. **cases.xlsx** – Excel spreadsheet detailing available customer names, telephone numbers, email addresses, mailing addresses, case totals, and case balances. Represents approximately 2,500 consumers. This is not the most reliable source of payment data and should mainly be used as a cross-reference for the amounts in other data sources; 3845 transactions.
 - a. **Source:** Defendant records provided by Court Appointed Receiver
29. **TRANSACT.xlsx** – Excel spreadsheet showing real monies in and real monies out with date entered into the loan mod system. This is not the most reliable source of payment data and should mainly be used as a cross-reference for the amounts in other data sources; 7731 transactions.
 - a. **Source:** Defendant records provided by Court Appointed Receiver

30. **cases Q_cus_in_only.xlsx** – Excel spreadsheet combining #28 and #29, showing “real” payments for each case number. This is not the most reliable source of payment data and should mainly be used as a cross-reference for the amounts in other data sources; 3277 transactions.
 - a. **Source:** Created by Court Appointed Receiver
31. **cases Query.xlsx** – Excel spreadsheet combining #28 and #29, showing “real” money in and out for each case number. This is not the most reliable source of payment data and should mainly be used as a cross-reference for the amounts in other data sources; 8274 transactions.
 - a. **Source:** Created by Court Appointed Receiver
32. **DC-MD BANK DEPOSITS.docx** – List of 33 clients with addresses and phone numbers where available, compiled by Defendant. Should be used for consumer names and contact information; 4 pages.
 - a. **Source:** Unclear
33. **Consumer Call Log as of 10-23-13.xlsx** – Spreadsheet of ~100 consumers who contacted the CFPB after the case was announced. Spreadsheet contains consumer names, addresses, phone number, and email addresses, where available, and notes about consumers’ calls; 100 transactions.
 - a. **Source:** Compiled by CFPB Enforcement Team
34. **CUSTOMERSRETAINEDMARCH 2012.pdf** – List of Active Customers from January 2012 – July 18, 2012 displaying approximately 850 customers and addresses. List compiled by Defendants as a result of the state bar requiring them to notify clients about the CFPB case and the suspension of their bar licenses. Not all customers on this list were necessarily affected by this case; 49 pages.
 - a. **Source:** Defendant
35. **Pipeline emails.pdf** – Series of emails and spreadsheets provided by Defendant, with lists of clients and amounts clients paid to Defendant. Includes data from September 2012 – February 2013, and should be used to supplement data from bank accounts in #23 (and #1-22) above; 1639 pages.
 - a. Includes multiple PDF copies of some spreadsheets. These spreadsheets will likely need to be reconstructed, as it appears they were excel files that were too wide for one page, and were printed in a series of columns.
 - b. **Source:** Defendant records provided by Court Appointed Receiver
36. **MNGMNT CLOSE PL.xlsx** – Excel spreadsheet showing various activity on client accounts ranging from July 2010 – October 2011. Also see #38, below. This spreadsheet contains names, addresses, and phone numbers for harmed consumers; 2000 transactions.
 - a. **Source:** Defendant

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37. **September- JLP Report.xlsx** – Excel spreadsheet showing customer pipeline by Defendant employee. This spreadsheet contains names, addresses, and phone numbers for harmed consumers; 114 transactions.
 - a. **Source:** Defendant
38. **MNGMNT CLOSE PL.xlsx** – Excel spreadsheet showing various activity on client accounts ranging from July 2010 – January 2013. This spreadsheet likely contains the same information as #36 above, with additional information for October 2011 – January 2013. This spreadsheet contains names, addresses, and phone numbers for harmed consumers; 2000 transactions.
 - a. **Source:** Defendant
39. **November- JLP Report.xlsx** – Excel spreadsheet showing customer pipeline by Defendant employee. This spreadsheet contains names, addresses, and phone numbers for harmed consumers; 60 transactions.
 - a. **Source:** Defendant
40. **December- JLP Pipeline.xlsx** – Excel spreadsheet showing customer pipeline by Defendant employee. This spreadsheet contains names, addresses, and phone numbers for harmed consumers; 90 transactions.
 - a. **Source:** Defendant

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Appendix II

Data Source Matrix

This matrix notes which documents should be used to obtain each type of data point. The document numbers correspond with those listed in the Data Catalogue. Each document should mainly be used only for those data points for which there is a "yes" in the appropriate column.

TYPE OF DATA									
		Victim Names	Victim Addresses	Victim Phone Numbers	Victim e-mail	Payment Amount	Date of Payment	Case Number (unique identifier)	Notes
DOCUMENT NUMBER	1-21	yes	yes			yes	yes		Cross-reference w/ #23
	22	yes	yes			yes	yes		Cross-reference w/ #23
	23	yes				yes	yes		Primary source for Payment data
	24								Supporting/ Explanatory document
	25	yes	yes	yes				yes	
	26								Supporting/ Explanatory document
	27								Supporting/ Explanatory document
	28-31	yes	yes	yes	yes			yes	Use payment amounts only for cross-reference
	32	yes	yes	yes					
	33	yes	yes	yes	yes				
	34	yes	yes						
	35	yes	yes			yes	yes		Reliable source of payment data, but in case of conflict with #23, #23 takes priority
	36	yes	yes	yes					Cross-reference w/ #38
	37	yes	yes						
	38	yes	yes	yes					
	39	yes	yes						
	40	yes	yes						